

4.5 Action on Inspection Report – Oak Brook College of Law and Government Policy



The State Bar of California

OPEN SESSION AGENDA ITEM 4.5 MARCH 2025 COMMITTEE OF BAR EXAMINERS

DATE: March 14, 2025

TO: Members, Committee of Bar Examiners

FROM: Natalie Leonard, Principal Program Analyst, Office of Admissions

SUBJECT: Action on Inspection Report – Oak Brook College of Law and Government Policy

EXECUTIVE SUMMARY

Oak Brook College of Law and Government Policy (OBCL), an unaccredited, correspondence law school, was inspected on October 28, and 31, 2024. The resulting inspection report from this standard periodic inspection is set forth in Attachment A and the law school's response to the inspection report is set forth in Attachment B. Staff recommends renewal of registration, with the next inspection to be set in fall 2027.

RECOMMENDED ACTION

Renewal of registration with the next inspection to be set for fall 2027.

DISCUSSION

Oak Brook College of Law and Government Policy is located in Fresno, California. It is incorporated as a religious corporation that offers both a JD program subject to the State Bar's Rules for Unaccredited Law Schools, as well as a 1-year paralegal certificate offered under other authority.

Unaccredited law schools are generally inspected at least every five years to evaluate their level of compliance with the Rules and Guidelines for Unaccredited Law Schools.

OBCL was last inspected in 2019, and its registration was renewed in April 2020.

At the conclusion of the current visit, a report identifying four recommendations was created as set forth in Attachment A.

The law school filed a response objecting to several of the conclusions including what it identified as supporting evidence. The report was modified to make clerical edits requested, and the law school's full response and objections are set forth in Attachment B.

Areas in which staff disagrees or finds the recommendation warranted are described below.

First, the law school's attrition appears to be significant according to staff and team analysis. The law school objects to the specific attrition number in the report because it believes that State Bar statistics overstate the number; taking this into account, staff finds the recommendation should stand for reasons described here. The law school notes that it has a unique schedule, in which first year students must take and pass the First-Year Law Students' Examination (FYLSX) before starting their second year in the January following the exam passage. This results in some students appearing to be first-year law students for two years rather than one in State Bar reports, if they do not pass the exam on their first try. Even so, attrition would only be reported once. In an abundance of caution, staff provides the outcomes by class cohort here. In 2021, nine students began the JD program; one of these students left the program prior to final exams, one left after final exams, and four were disqualified after not passing the FYLSX within three opportunities (although one was subsequently re-enrolled), leaving two students enrolled. In 2023, ten students began the JD program; two withdrew prior to final exams, and two did not take or pass the FYLSX, and were not enrolled in their second year. Thus, 40 percent of the 2023 1L cohort is not enrolled in their second year.

These outcomes are sufficient such that the law school must review its communications to prospective students regarding the requirements of law study, its admissions process, and the support provided to students to understand how to improve students' reasonable opportunity to license.

In the area of finances, the law school operated at a loss as of October 2024. The school has considered a merger, purchase, or closure, but so far has not pursued any of these options. The law school did not recruit a class in fall 2022, and is currently not recruiting a class for fall 2025, but is accepting statements of interest and reserving the right to enroll a fall 2025 class. The law school advised in its response that it has funds in reserve, faculty willing to commit their time, and it plans to only accept future classes if it has the resources to support them. The law school should affirmatively advise the State Bar whether it will be enrolling a fall 2025 class or beyond, as well as transfer students, as soon as this decision is made.

Because the law school's retention rates are falling, and the law school cannot determine whether it will continue operations, it is recommended that the next inspection be set in 2027 to maintain sufficient monitoring while the law school determines its plans for the future.

PREVIOUS ACTION

[Approval of Periodic Inspection Report – Oak Brook College of Law and Government Policy,](#)

Committee of Bar Examiners, April 2020

FISCAL/PERSONNEL IMPACT

None

AMENDMENTS TO RULES

None

AMENDMENTS TO BOARD OF TRUSTEES POLICY MANUAL

None

STRATEGIC PLAN GOALS & IMPLEMENTATION STEPS

None – core business operations

RESOLUTIONS

If the Committee of Bar Examiners agrees with the recommendation, the following resolution should be made:

RESOLVED, that the Committee of Bar Examiners receives and adopts the inspection report of OBCL including all of its recommendations as set forth in Attachment A and receives and files the law school's response as set forth in Attachment B; and it is

FURTHER RESOLVED, that the Committee of Bar Examiners renews the registration of Oak Brook College of Law and Government Policy and sets its next inspection for winter 2027; and it is

FURTHER RESOLVED, that the law school submit as part of its 2025 annual report, evidence documenting the completion of all recommendations included in the inspection report; and it is

FURTHER RESOLVED, that the law school also advise in its annual report whether or not it has enrolled a fall 2025 class and whether plans to enroll future classes.

ATTACHMENTS LIST

- A. Inspection – Oak Brook College of Law and Government Policy
- B. Response to Inspection from Oak Brook College of Law and Government Policy



The State Bar of California

Oak Brook College of Law

Periodic Inspection Report

Inspection conducted
Pursuant to Rule 4.244(A) of the
Unaccredited Law School Rules on:

October 28 & 31, 2024

Visitation Team:

Rocco Lamanna,
Educational Standards Consultant

Ellie Shefi,
Educational Standards Consultant

Theresa Solenski,
State Bar of California Staff, Educational Standards

REPORT ON THE PERIODIC INSPECTION OF OAK BROOK COLLEGE OF LAW

INTRODUCTION

The State Bar conducted a periodic inspection of Oak Brook College of Law and Government Policy (OBCL), a registered, unaccredited correspondence law school on October 28 and October 31, 2024, pursuant to Unaccredited Law School Rule 4.244(A) via videoconference. The inspection team consisted of educational standards consultants Rocco Lamanna and Ellie Shefi, and Theresa Solenski supported by State Bar staff.

Background

The purpose of this routine periodic inspection is to evaluate OBCL's compliance with the Unaccredited Law School Rules (Rules) and Guidelines for Unaccredited Law School Rules (Guidelines). OBCL's last periodic inspection took place in December 2019. The Committee of Bar Examiners (CBE) reviewed the resulting report and determined that the law school was in compliance with the Rules and Guidelines, except as noted in the three recommendations listed in that report.

OBCL is a registered, unaccredited, correspondence law school with an office in Fresno, California, incorporated in the State of California as a religious corporation and has section 501(c)(3) nonprofit status. It was founded in 1994 with the mission "to train individuals who desire to advance the gospel of Jesus Christ through service as advocates of truth, counselors of reconciliation, and ministers of justice in the fields of law and government policy." Pursuant to California Corporation code section 9110-9160, the law school's status as a religious corporation allows it to incorporate its statement of faith into its mission and practices. All students and faculty are required to agree to a Statement of Faith, as well as to include a recommendation from the applicant's pastor or church leader as part of the application.

While OBCL is a correspondence law school and nearly all work is conducted remotely on demand, the JD program does require its first-year students to attend a weeklong conference before the start of regular classes during which students have the opportunity to meet their fellow students and faculty. During the Conference, first-year students take a one-credit course, Introduction to Law, taught by the Associate Dean Robert Barth and other first-year course professors.

At the time of inspection in October 2024, the law school enrolled 16 students in the four-year part-time JD program. OBCL does not offer any other degree programs or a full time JD program. Students in the JD program must successfully complete 87 credits of coursework and at least 864 hours of study each year for four years to graduate with a JD. All courses in the JD program are required. Elective credits are in addition to the required 87 credits, are offered in the third and fourth year, and are not required. All bar exam-tested subjects are taught as required courses. In addition, students take a legal writing class each year, with the fourth-year legal research and

writing class requiring a substantial original piece of legal research and analysis as part of the practical skills training requirement. The additional hours needed to fulfill this requirement are provided through either Trial Advocacy or Dispute Resolution, as well as Appellate Advocacy. After students complete their first year of law school, they must withdraw until they pass the First-Year Law Students' Examination. Upon passing the examination, students may enroll as second year students during the January following the passage of the exam.

Between October 2021 and January 2025, 10 students passed the First-Year Law Students' examination. Pass results by exam administration were as follows: October 2021 – 50 percent of 8 takers; June 2022 – 0 percent of 3 takers; October 2022 – 29 percent of 7 takers; June 2023 – 100 percent of 1 taker; October 2023 – no takers; June 2024 – 100 percent of 1 taker; October 2024 – 29 percent of 7 takers.

Between July 2021 and January 2025, 14 graduates have passed the California bar exam. Pass results by exam administration were as follows: July 2021 – 22 percent of 9 takers; February 2022 – 40 percent of 5 takers; July 2022 – 13 percent of 8 takers; February 2023 – 33 percent of 3 takers; July 2023 – 67 percent of 3 takers; February 2024—30 percent of 10 takers; July 2024—42.9 percent of 7 takers.

Submission of Self-Study Materials

To prepare for the inspection and draft this report, the team reviewed the law school's self-study, 2023 and 2024 Annual Compliance Reports, website, Catalog, Student Handbook, Faculty Handbook, student results on State Bar exams, and records requested by the State Bar, including syllabi, course examinations, faculty evaluations, and meeting minutes from various committees, met with the law school on the dates noted above, and corresponded with the law school regarding follow up questions.

Conduct of Site Visit

The inspection took place via videoconference on October 28 and 31, 2024. During the visit, the inspection team met with administrators, faculty members, and five students, and attended a video tour of the law school's administrative headquarters.

The inspection team also observed sessions of the following three Fall 2024 courses: Wills and Trusts, Community Property, and Remedies and found the materials to be educationally sound, but noted that interactive video format or Populi's discussion board feature could assist in providing active educational engagement that may improve educational outcomes and assist the law school in better assessing student progress in a timely manner and providing academic support. Lessons generally included a PDF summary document, reading and writing assignments, and a voice-recorded lecture. Because the law school is a correspondence law school, it is not required to provide live sessions, so long as the education is sound. Consistent with this, generally, the lectures did not contain a visual element such as a PowerPoint with information or a video of the professor teaching. Voice-recorded lectures varied in length both within and across

courses; some were nearly an hour and others as short as 16 minutes. One Fall 2024 course, Remedies, did not include voice-recorded lectures.

INSPECTION OBSERVATIONS

Compliance Issues Observed in October 2024

1. Rule 4.241(A)(10); Guideline 2.3(D): The law school is not fully compliant with Rule 4.241 and Guideline 2.3(D). Its disclosures provided to students do not include attrition rates in the format required by section (A)(10) of the rule and in a forthright manner as required by Guideline 2.3(D).

OBCL's Rule 4.241 Disclosure does not include statistics of attrition for the last five years, though the rule requires it to do so. Rather, the disclosure included the number of enrolled students per year. According to OBCL's 2024 annual report, 43 percent of 2023 first-year JD students did not re-enroll for a second year. OBCL requires its students to pass the FYSX prior to enrolling in the second year, which factors into the first-year attrition rate. Prospective students should clearly understand the law school's State Bar exam pass rates, enrollment schedule, and attrition prior to enrolling in the law school.

The law school must include attrition data as required by Rule 4.241 as part of its duty to be forthright in its communication with current and prospective students. By omitting this data, prospective students do not the full context required by the Rules to make an informed decision about enrollment at OBCL.

To comply with Rule 4.241 and Guideline 2.3(D), the law school must revise its disclosure to include attrition rates for the last five years, as dictated by section 10 of the rule.

2. Rule 4.240(E); Guideline 5.17: The law school is not compliant with Guideline 5.17, which states, "there should be a reasonable correlation among the grades of all instructors teaching the same group of students" and grading standards must ensure accuracy, validity, reliability, and consistency in the evaluation of student performance.

OBCL does not have a written grade correlation policy to ensure the scores of all instructors who teach the same group of students have a "reasonable" correlation to one another, as required by the guideline. While the school did include grade distributions in its self-study, it did not demonstrate an attempt to analyze grades for reasonable correlation nor efforts to calibrate grades among professors.

Two of the law school's grade-related practices undermine the ability of grades to ensure accuracy and validity in the evaluation of student performance: 1) OBCL does not have policies limiting the percentage of homework assignments that may contribute to a final grade. In

practice, homework accounts for up to 30 percent of a final grade in some courses, and the law school is encouraged to evaluate whether the grades on homework are graded consistently with examination grades, resulting in a final course grade that reasonably apprises a student of their mastery of the subject; 2) the law school allows reuse of examinations year-to-year without safeguards in place to ensure exam security such as monitoring for exam question repetition by the dean.

To comply with the guideline, the law school must assess the efficacy of its grading standards in ensuring grades reliably and consistently evaluate student performance. OBCL should also institute policies to limit the contribution of homework on a final grade and prohibit the reuse of examinations year-to-year. The law school must take steps to improve exam security so that student performance represents mastery of the subject rather than ability to access prior exams.

3. Rule 4.240(H); Guidelines 5.26 and 5.27: The law school should review its admissions policy to maintain compliance with Guideline 5.26, which states that the law school must adopt and maintain a sound written admissions policy, and Guideline 5.27, which states a law school must adopt adequate and appropriate screening procedures to ensure that persons who clearly lack the ability or the educational background to study law are not admitted or allowed to continue as students. A law school must not admit any student who is obviously unqualified or who does not appear to have a reasonable prospect of completing the degree program.

While OBCL does have a written admissions policy, its 2023 cohort first-year attrition is 43 percent, an increase from the 2022 cohort with an attrition rate 33 percent. While this is in line with similar law schools, it is increasing, and the law school should investigate as to why this is happening and make changes that are appropriate to its findings.

The law school stated most 1L attrition occurs in the first four months of law school and that time management may be an issue for some students. The law school does not have a minimum GPA or LSAT requirement, although they do underscore the importance of an adequate personal support system in the admissions application, which they attempt to create through the on-campus seminar.

While the law school could identify common reasons for attrition, the school must identify steps to address the increasing attrition. OBCL implements a teaching assistant program for first-year students. Teaching assistants are standout third- or fourth-year students chosen by the Director of Administration and the Associate Dean who provide extra support to first-year students as needed. Students told the inspection team that they often meet with their teaching assistants on Saturday for tutoring and review.

The teaching assistant program began in 2000 as OBCL's initiative to improve outcomes in the first year, including attrition. The law school must take additional steps to modify its admissions and subsequent education to address the factors identified that are affecting attrition: time management, commitment to studying law at this time, and academic preparation.

4. Rule 4.240(K); Guideline 8.1: The law school is not compliant with Guideline 8.1, which requires that a law school must have adequate present and anticipated financial resources to support its programs and operations.

OBCL operated at a yearly loss of about \$10,000 as of October 2024. Previously, the law school, a California nonprofit religious corporation, operated in association with another faith-based entity, but that relationship has ended. Since that time, the school has been examining addition options going forward. It has considered continuing operations, merger, purchase and closure, but so far has not taken steps to depart from current operations.

While considering its path forward, the law school chose not to enroll a first-year cohort in 2024, potentially contributing to this year's deficit, which was covered by reserves. According to OBCL's three-year financial projection, the law school intends to return to modest profitability by the end of 2025 and earn a profit of \$46,000 in 2027. This projection assumes an end to the pause and a sizable increase in the fall 2025 1L cohort versus prior years, which seems subject to risk since enrollment was declining prior to the fall 2024 recruiting pause and the school is not currently accepting applications, though they are accepting statements of interest and may start a new class if sufficient interest is received.

To help effectuate its projections, the school did hire a consultant to increase online advertising to improve enrollment, but the campaign did not yield qualified and religious mission-focused applicants that the law school seeks to enroll.

Because the law school has not been able to increase enrollment on its own or with the help of consultants or secure a sale or merger partner, the law school will need to make difficult choices in order to continue to operate. Income for this school is derived almost completely from tuition.

The law school must produce reasonable evidence of its financial position to its current and prospective students, demonstrating how it can continue to operate to provide a sound legal education to students and ensure all enrolled students have a reasonable opportunity to graduate with a degree and license.

CONCLUSION AND RECOMMENDATION

The inspection team found OBCL to need to take steps to come into compliance with the following two rules: Unaccredited Law School Rules 4.240 and Rule 4.241(A)(10). Noncompliance was found in four of the 14 standards of Rule 4.240 as described in the report:

- (B) Integrity, due to the incorrectly stated attrition rates in its Rule 4.241 Disclosures
- (E) Educational Program, due to a lack of grade calibration practices, contributed by high attrition
- (H) Admissions, due to a lack of sound applicant screening procedures and high first-year attrition
- (K) Financial Resources, because the school has low and decreasing enrollment resulting in the school operating at a loss

OBCL must also take steps to come into compliance with the following five Guidelines for Unaccredited Law Schools, as noted above: Guidelines 2.3, 5.17, 5.26, 5.27, and 8.1.

Overall, the inspection team found the law school's administration, faculty, and students to be enthusiastic about, and dedicated to, its JD program. Students identified the following elements as strengths of the JD program: the convenience of the asynchronous correspondence modality, the level of academic support, and faculty responsiveness.

OBCL recently instituted a teaching assistant program consisting of stand-out third-and fourth year students to boost outcomes among students in the first-year. While the law school has not analyzed the impact of this program yet, this initiative highlights the law school's effort to provide students with a reasonable opportunity to license.

The law school must address the deficiencies noted in this report to ensure compliance with the unaccredited rules and guidelines, including whether and how it plans to operate in the future.



Oak Brook College of Law

Pro Deo et Patria

February 25, 2025

Natalie Leonard
Principal Program Analyst, Educational Standards
Office of Admissions
State Bar of California
180 Howard Street
San Francisco, CA 94105

RE: Response to 2024 Periodic Inspection Report: Oak Brook College of Law

Dear Ms. Leonard:

We have received the Report on the periodic inspection conducted on October 28 and 31, 2024, and take this opportunity to comment and to object in part to the conclusions reached.

Oak Brook College of Law (OBCL) has a 30-year history of providing a quality legal education consistent with its mission and purpose. The performance of its students and its graduates speaks for itself. In the history of the school, almost 75% of the students who took the FYLSX passed and over 76% of its graduates have passed the CA Bar Exam. Many of these graduates would not have had the opportunity to receive a legal education consistent with their convictions had it not been for Oak Brook College of Law. While OBCL has had a declining enrollment, it is fully committed to ensuring that current students receive the same quality legal education, even if OBCL decides not to enroll students in the next year or two.

Comments on the Inspection Team's Description of Oak Brook College of Law

In the first paragraph of the skeletal background section of the Report, the Inspection Team states this about the 2019 inspection and the CBE's action in response to the 2019 report: "The Committee of Bar Examiners (CBE) reviewed the resulting report and determined that the law school was in compliance with the Rules and Guidelines, except as noted in the four recommendations below." On the basis of the 2019 report, the CBE did conclude that OBCL was in compliance and the "recommended mandatory actions" made by the consultant in the 2019 report did not deal with any of the "four recommendations below" if that phrase pertains to the 4 conclusions stated in the current Inspection Team's 2024 Report. It is unclear what the 2024

Team meant by that statement. **Attached as Exhibit A is a copy of OBCL’s response to the 2019 inspection report.** OBCL addressed all of the recommendations made by the consultant in 2019.

To make things totally clear, at the time of the 2024 inspection OBCL had 16 students in the JD program as follows: 8 students who completed their first year in August 2024, 2 students in the second half-year term of their third year, and 6 students in the second half-year term of their fourth year. The year for the third and fourth-year students ended in December 2024. So, at the time of the inspection, 8 students were enrolled in courses, and the first-year students who took the October FYLSX were waiting for the results.

In January 2025, OBCL’s second-year class consists of 8 students: 2 students who passed the October 2024 FYLSX, 1 student who passed the June 2024 FYLSX, 1 student who passed the FYLSX in October 2022, and 4 students who did not take or did not pass the October FYLSX with the understanding that they need to pass the FYLSX either in June 2025 or October 2025, to receive any credit for their second year of legal studies, as permitted by Rule 4.31 of the CA Admissions and Educational Standards. For 2025, OBCL made an exception to its general rule that a student must pass the FYLSX before beginning their second year of legal studies.

With respect to the FYLSX and CBX passage rates stated on page 3 of the 2024 Report, these numbers include both first-time and repeat takers on the listed administration dates. For the July 2023 CBX results, the number should be 67% (2 out of 3) passed that Bar Exam rather than 75%, as reported by the 2024 Inspection Team.

Comments and Questions on Inspection Team’s Observations

1. Rule 4.241(A)(10); Guideline 2.3(D) regarding attrition statistics.

OBCL may be unique in that, except for the first year, its academic year goes from January through December and students can only enroll in January for the second, third, and fourth years. OBCL does not have a revolving enrollment. Consequently, it has been uncertain how attrition rates should be reported when September 15th (the report date) is after a first-year class ends but before the second-year class begins. As of September 15th, the first-year students who completed their first year in August are no longer enrolled in their first year but have not yet enrolled in their second year. OBCL administration had the question whether any of the first-year students should be counted in the enrollment numbers because they are not enrolled in courses as of September 15th.

On January 28, 2025, the Office of Admissions advised us that those first-year students who completed their first year in August should still be counted as first-year students on September 15th. This direction impacts how OBCL reports attrition.

Based upon this direction, OBCL updated its disclosure statement to include attrition rates and updated its Section 6061.7(a) annual report on its website. **See attached Exhibit B for a copy of the updated disclosure statement as posted on the OBCL website.**

Historically, OBCL had always dis-enrolled first-year students if they failed to pass the FYLSX exam on the first administration after becoming eligible (October) because they would not be enrolled in second-year courses in January. It seems misleading to count students who are not enrolled in courses as actually part of a class for reporting purposes. OBCL internally views first-year attrition to involve those who do not successfully complete their first-year course work, whether voluntarily or involuntarily. For example, OBCL had 10 students enroll in their first year in August 2023. Eight of these students completed their first year and were eligible to take the FYLSX in October 2024. This is a 20% attrition rate for the 2023 first-year JD students.

However, per conversations with the Education Evaluator for our 2019 site visit and subsequent conversations with California Bar Staff, we were told that for CA Bar reporting purposes OBCL should not dis-enroll first-year students until after the third administration of the FYLSX (since becoming eligible) had passed. This means that students would still be considered in their first year even though they are not enrolled in courses and could be in that status for well over a year after completing their first-year coursework. What is significant about this revised direction in reporting is that it affects how attrition is calculated in a way that—at least from OBCL’s perspective—seems misleading.

As of the September 15, 2023 report date, OBCL had 10 students who just started their first year in August 2023 and 4 carry-over students from the class that began in 2021 that we were directed to report in the 2023 1st Year JD Cohort and Attrition. In December of 2023, the time lapsed for the 4 carry-over students to pass the FYLSX. OBCL marked these students as attrited in 2024. Two of the new students in the 2023 class also voluntarily dis-enrolled during the year from September 16, 2023 - September 15, 2024, making for a total attrition of 6 individuals as of September 15, 2024.

This explanation of OBCL’s situation is given to explain the facts behind the blanket and somewhat misleading statement contained in the 2024 Report, “According to OBCL’s 2024 annual report, 43% of the 2023 first-year JD students did not re-enroll for a second year.” In reality, only 20% of the 2023 first-year JD students were not eligible to enroll in their second year. The remaining students not enrolled in the second year in 2024 were carry-over students from the August 2021 class. (OBCL did not have a 2022 class.)

The OBCL administration would appreciate clarification on how it should report the students who do not take or do not pass the October FYLSX after first becoming eligible and are not enrolled in second-year courses the following January. Should OBCL count as current first-year students all the students who finished their first year in August but do not enroll in second-year courses in January of the next year, plus the students in the carry-over period of almost 1½ years—if they never enroll in second-year courses?

- 2. Rule 4.240 (E); Guideline 5.17 regarding correlation among grades among instructors teaching the same students; homework assignments; and exams.**

- A. OBCL has always interpreted Guideline 5.17 (Grading Standards) to include the instruction that if there are two sections for the same course taught by different professors, there needs to be a sound policy on how the exams given by two different instructors would be evaluated as comparable and how the grades should be calibrated between the instructors. OBCL has never had more than one professor teach any given course and therefore saw no need to have a policy regarding grade correlation between instructors of the same course.

Furthermore, pursuant to the written instructions given to prepare a self-study for a periodic inspection, there was no request to address Guideline 5.17 in a self-study under Rule 4.240 (E). The instructions gave specific bullet points to be discussed and a list of required attachments to be supplied. Section 8 of those Instructions stated, “Rule 4.240 – (E) EDUCATIONAL PROGRAM. The law school must maintain a sound program of legal education. (Guidelines 1.11, 5.1-5.15)”. OBCL discussed all the points requested on pages 19-25 of its Self-Study, including “the relationship between students’ first-year grade point average to FYLSX results and graduates’ final grade point averages to CBX results and all efforts undertaken to improve academic performance and examination results.”

With respect to the analysis of the relationship between first-year grade point average and FYLSX, OBCL reported on pages 23-24 of its Self-Study as follows:

“In the years from October 2019 through October 2023, there were a total of 34 OBCL students who took the FYLSX and 15 of them passed on the first attempt. This is a first-time success rate of 44.1%. Of the students who did not pass the first time during this 5-year period, 12 took the FYLSX one or more subsequent times. Seven of these repeat takers passed the exam for a 58.3% repeat taker pass rate. Combining those who passed the exam on the first time with the successful repeat takers gives an overall pass rate of 22 out of 34, or 64.7%, for this five-year period.

“Of those students who passed the FYLSX on the first attempt, none of them had below a 2.20 GPA at the end of the first year. Of the students who passed the exam on the first attempt, only one had a first year GPA of between 2.00 and 2.50 (2.24). This means 14 of the 15 students who passed the FYLSX the first attempt, or 93.3% had a first-year GPA of 2.50 or above at the end of their first year.

“Of the 7 students who took the FYLSX more than once before passing, 3 had a GPAs between 2.00 and 2.50, and 4 had GPAs of 2.5 or above. This means that 4 out of 7 (57.1%) of the successful repeat takers had a GPA above 2.50 at the end of their first year.

“These results show that 18 of the 34 students (52.9%) of the Oak Brook College students who passed the First-Year Law Students’ Exam in the last five years had a first year GPA of more than 2.50.”

With respect to the analysis of the relationship between the graduates' final grade point average and the CBX, OBCL reported on pages 24-25 of its Self-Study as follows:

“One would expect that those graduating with higher law school GPAs would have a higher success rate on the general bar examination and this is the case. For the February and July 2019, 2020, 2021, 2022, 2023, and the February 2024 examinations, OBCL had 22 first time takers of which 11 passed. This is a first-time pass rate of 50%. For these same exams there were 27 who took the exam for the second or more times (repeat takers), of which 13 passed for a 48.1% repeat taker pass rate. The OBCL overall general bar exam pass rate for individuals who took the exam during these five years was 55.8% (24 out of 43).

“Of those graduates who passed the CBX on the first attempt, all but one (2.71) had a final GPA of higher than 3.10. The average law school GPA for the graduates who passed the bar exam on the first attempt during February 2019 through the February 2024 was 3.29. Nine of the 13 successful repeat takers also had final GPAs above 3.10. The successful repeat takers average GPA was 3.15 making the overall average final GPA for all successful OBCL takers 3.21.

“In the group of 24 successful CBX takers, 19 of them (79%) had a GPA of 3.10 or higher, with 3.65 being the highest GPA and 2.71 being the lowest. In the group of 19 unsuccessful CBX takers, their average final GPA was 2.76, with a range of GPAs from 2.08 to 3.31.”

None of the requested information under Rule 4.240 (E) was addressed in the 2024 Inspection Team Report. And, it was a surprise to see Guideline 5.17 raised in the Inspection Report with respect to Rule 4.240 (E).

Rule 4.240 (G) – Scholastic Standards; Guidelines 5.14-5.25

- B. As acknowledged by the Team, OBCL did include a grade distribution analysis, including a discussion on uniformity in grading standards on pages 27-34 of its Self-Study and Exhibit 17 thereto. But this was done in conjunction with the instructions and information requested pursuant to Rule 4.240 (G) –Scholastic Standards; Guidelines 5.14-5.25. In Exhibit 17, OBCL gave grade distribution data for each course ending in 2019 through 2023. In the text of the Self-Study, OBCL gave the median grades for all the substantive and skills courses ending during 2019-2023. The conclusion was “[t]he median grade for each of the first-year substantive courses (Contracts, Torts, and Criminal Law) is in the “B–/C–” range. The median grade for the substantive courses in the second, third, and fourth year is higher, and most of the courses have a median grade of “B/C” range.” And, “[t]hese grade distributions show that after the first year, the median grades as a whole are higher. This is expected because the less qualified students do not continue past the first year. Also, because of the workshops for the skills courses, these grades tend to be higher.”

OBCL prepared the grade distribution information and analysis in response to the directive under Rule 4.240 (G) to discuss the school's “policies, procedures and efforts to: 1) maintain uniform grading standards; 2) identify and curb grade

inflation; and 3) ensure that grades accurately reflect students' abilities and their likelihood of completing a J.D. program that offers the reasonable possibility of passing the FYLSX and the CBX."

In relation to Rule 4.240 (G), if OBCL is not correctly interpreting the Guideline 5.17 language that "there should be a reasonable correlation among the grades among several instructors teaching the same group of students," please advise.

- C. As with "Grading Standards" Guideline 5.17, Guidelines regarding exams and evaluating a student's performance in a course are also under Rule 4.240 (G) and Guidelines 5.14 -5.25. **See attached Exhibit C for the Scholastic Standards section of OBCL's Self-Study, pages 27-34, which includes a discussion of these guidelines.**

Regarding homework assignments, professors have the liberty to require lesson assignments that are then graded by the professor. Required assignments encourage discussion for interactive Zoom calls and help the professor know how well the students are comprehending the course material. Plus, required graded assignments would count toward academic engagement hours needed to satisfy accreditation standards. For some courses (like UCC and Remedies) assigning problems is an effective modality of teaching the material. All the OBCL course syllabi were provided to the inspection team for review. A "statement of the basis for the final grade for each course" is included in all the syllabi. If the CBE requires OBCL to have a more specific policy regarding graded assignments, it can develop one recognizing that in some courses (skills courses) 100% of the grade is determined by assignments and/or performance. As acknowledged in the Report, no more than 30% of a student's grade in substantive courses is determined by graded written assignments. If OBCL developed a specific policy, we would not expect graded assignments in substantive courses to count for more than 30% of a student's final course grade.

- D. Regarding course exams, most professors have a bank of questions from which they draw to prepare an exam for a course. Only retired exams are made available to the students. Active examination questions are not given to the students and are not available to the students. OBCL has strict instructions for proctors and a firm academic honesty policy. The current written policy regarding exams in the OBCL Faculty/Administrative Handbook states:

§8(g)(2) Final Exams. Final exams are to be prepared well in advance of the end of the semester. Final examinations for the substantive courses usually consist of essay questions and, in some cases, a multiple choice test. New essay questions should generally be prepared for each examination. However, multiple choice questions may be used on more than one exam.

Relevant policies regarding exams stated in the OBCL Policies and Procedures Handbook that students see include the following:

§6(1)(a) Examinations. During the first year, the final grade for all substantive law courses is determined by the students' performance on a midterm examination (25%) and a final examination

(75%), subject to adjustments for failure to complete required writing assignments. During the second, third, and fourth years, 100% of the final course grade is generally determined by performance on the final exam or other appropriate method of evaluation, subject to adjustments for failure to complete required writing assignments. For practical courses, such as Legal Research and Writing I, II, and III, the final grade is based upon a series of written assignments. For skills courses (such as Trial Advocacy), the final grade is determined by appropriate means. Except for legal externships

§6(1)(a) Examinations. During the first year, the final grade for all substantive law courses is determined by the students' performance on a midterm examination (25%) and a final examination (75%), subject to adjustments for failure to complete required writing assignments. During the second, third, and fourth years, 100% of the final course grade is generally determined by performance on the final exam or other appropriate method of evaluation, subject to adjustments for failure to complete required writing assignments. For practical courses, such as Legal Research and Writing I, II, and III, the final grade is based upon a series of written assignments. For skills courses (such as Trial Advocacy), the final grade is determined by appropriate means. Except for legal externships, the College policy is that pass/fail grades are not given for courses.

§6(1)(g) Anonymity in Grading. The College maintains an anonymous grading policy. Each student receives a student I.D. number upon enrollment in the College. Students use this I.D. during electronically administered exams, or write their I.D. numbers on the examinations if an exam accommodation has been granted. The students' names are not to appear at any place on the exam or the return envelope. This anonymity policy does not apply to skills courses, courses in which written assignments are used for student evaluation, or to required writing assignments.

§6(1)(j) Copies of Graded Examinations. Students shall be sent a copy of all graded first-year essay answers, at the discretion of the course professor, once they have been received by the College Administrative Offices. Copies of multiple-choice examinations shall not be returned to the students. Second-, third-, and fourth-year examinations may be returned to the students at the discretion of the course professor.

§6(1)(k) Calculation of Course Grades. All student examinations are evaluated by the course professor and a final letter grade is assigned according to the following qualitative assessments:

- A—Indicates excellent mastery of subject material
- B—Indicates good mastery of subject material
- C—Indicates satisfactory mastery of subject material
- D—Indicates poor understanding of subject material
- F—Failure
- P—Pass
- W—Withdrawn (after the end of the eight-day cancellation period)
- WF—Withdrawn while failing

§6(1)(l) Calculation of Grade Point Average. Cumulative grade point averages are calculated by dividing the total number of quality points (points assigned to the letter grade earned in a course multiplied by the number of credit hours for a course) earned in graded courses by the number of course credit hours attempted in those courses. Pass/Fail course grades are not included in the GPA calculation.

A	(4.00)	C–	(1.67)
A–	(3.67)	D+	(1.33)
B+	(3.33)	D	(1.00)
B	(3.00)	F	(0.00)
B–	(2.67)	WF	(0.00)
C+	(2.33)	W	(0.00)
C	(2.00)*	P	(Credit but no quality points)

(R) (Indicates the letter grade for a repeated course exam. Quality points assigned for a course when a course exam is repeated are one-half of normal value.)

* Minimum GPA required for graduation

§6(4) Anticipated Learning Outcomes

Students should be able, at the end of each year or semester, to pass a final examination which covers all material they have studied in that subject. Students should also have acquired a thorough working knowledge of each subject area, which they will be able to apply in taking the bar examination and in their prospective legal practice. Learning objectives for each lesson are set forth in the syllabus for each year.

It should be noted that Guideline 5.15 specifically provides, “Subject to compliance with the other guidelines on grading, a law school may reuse its prior examinations.”

3. Rule 4.240 (H); Guidelines 5.26 and 5.27 regarding admission policies.

OBCL certainly acknowledges and has always been committed to the requirement that “a law school must not admit any student who is obviously unqualified or who does not appear to have a reasonable prospect of completing the degree program” (Guideline 5.26). OBCL discussed its admission policies on pages 34-44 of its Self-Study and included an analysis of those admitted in 2019 through 2024. In addition to the rigorous application process, many applicants are interviewed to evaluate subjective factors such as “a sense of calling, character, motivation, and commitment” (page 37 of Self-Study). As of 2018, OBCL requires the LSAT test unless waived for good reason and that score is also considered in the admission decisions. OBCL is very mindful of the requirement not to allow a student to continue if a person clearly lacks the ability or the educational background to study law (Guideline 5.27). This is why OBCL thinks it is generally a good idea not to allow a student to continue into the second year until the student has passed the FYLSX. Passing the FYLSX is additional evidence of a student’s likelihood to successfully complete the remainder of the legal course of study and pass the Bar exam.

The only factor discussed in the 2024 Report to indicate that the admission policies should be reviewed is the attrition rate between 2022 and 2023. One wonders if the Inspection Team considered the detailed analysis of the last five years done by OBCL and reported in its Self-Study. As previously discussed in number 1 above, an attrition analysis depends on what category of students are counted in the attrition calculations. Are the “carry-over” students who have not taken or passed the FYLSX within three administrations counted in the first-year attrition rate, or do those calculations only include those who did not successfully complete their first year?

In its Self-Study OBCL states on page 40 under the heading of “First-Year Attrition” the following:

“The attrition rate is one element of the legal education process that the Oak Brook College faculty and administration continue to review. The average first-year attrition (for all reasons prior to final exams) for the classes that began in August 2019-August 2023 was 14 out of 53 students or 26%. This is a lower first-year attrition rate than what was reviewed in the 2019 Self-Study for the years 2013-2018. For those classes the average attrition rate was 40% (27/68).”

As previously discussed, the Report includes in its attrition discussion those students in the “carry-over” period who did not take or did not pass the FYLSX within three administrations. In its Self-Study OBCL discusses attrition based upon those students who did not successfully complete their first year of legal study, whether voluntarily or involuntarily. There are many reasons why students do not complete their first year of legal study, or even if they do, why they do not continue after the first year. With many students working and with families, time constraints become a hard reality. Health issues, financial resources, family priorities, and changes in jobs are additional reasons why some students do not continue. To make a judgment on the integrity of OBCL’s admission process and standards solely on attrition rates that include “carry-over” students is at best incomplete.

OBCL’s admission policies are sound and the application process is rigorous.

4. Rule 4.240 (K); Guideline 8.1 regarding financial resources.

The individuals responsible for OBCL are fully committed to ensuring that every student enrolled in the law school will be able to complete their academic program with OBCL. In addition to ongoing tuition income, OBCL has over \$150,000 in liquid assets. OBCL has and will have adequate financial resources to (A) provide all educational services it said it would provide, (B) Ensure all students admitted have a reasonable opportunity to complete the program and obtain degrees, and (C) Pay all refunds to which students are entitled, as required by Guideline 8.1.

If OBCL has enough qualified applicants to enroll classes in the future, the \$10,000 per student tuition amount will be sufficient to cover the costs of teaching those students. If the College does not enroll more students, the College will still have sufficient funds generated by the remaining students and from OBCL’s cash reserves to pay the necessary expenses. In addition, the OBCL alumni association has expressed interest in assisting the College as necessary to support the College's mission.

Oak Brook College was not started as a business but as a faith-based mission. It will be faithful to serve those students it admits through their graduation as a matter of integrity, commitment, and responsibility. To state or imply that OBCL is currently not able to comply with Rule 4.240(K) and Guideline 8.1 is unwarranted and without basis.

Conclusions

The inspection team cited four areas in which OBCL needs to come into compliance. The basis for three of the four areas is only the inspection team’s interpretation of OBCL first-year attrition rate for 2023-2024.

1. **Rules 4.240 (B) and 4.241(A)(10) and Guideline 2.3(D) for not posting attrition rates in a specific format on the OBCL website.** OBCL has revised and posted an updated disclosure statement, a copy of which is included with this response. There is significant confusion on how to calculate attrition rates depending on whether “carry-over” but not enrolled students are counted as still in the first-year class for up to almost 2½ years from the time they first enroll.

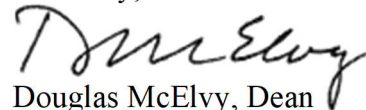
2. **Rule 4.240 (E) [or 4.240 (G)] and Guideline 5.17 regarding lack of calibration practices and attrition rate.** As explained above, OBCL has no courses where there is more than one instructor for the same course. Thus, there is no need for calibration of grading procedures “among instructors teaching the same group of students.” Furthermore, a professor’s discretion to include graded assignments as part of a student’s final course grade is appropriate and in some courses advantageous for the student’s comprehension of the subject matter. OBCL’s exam policies are secure and give faculty members the flexibility of designing an exam deemed best to test the student’s comprehension of the course subject matter. OBCL disagrees with the Inspection Team’s conclusion and has explained why OBCL is in compliance.

3. **Rule 4.240 (H) and Guidelines 5.26 and 5.27 regarding admission policies and attrition rates.** OBCL has a rigorous application process that considers more than test scores and GPAs. Law student attrition is a result of several factors and an attrition rate cannot be the only factor to evaluate a school’s admission policies. OBCL disagrees with the Inspection Team’s conclusion and has explained why OBCL is in compliance.

4. **Rule 4.240 (K) and Guideline 8.1 regarding financial resources.** OBCL has operated for 30 years with dedicated faculty and staff who are willing to sacrifice to ensure that the admitted students receive the legal education OBCL represented they would receive. In addition to ongoing tuition and liquid assets of over \$150,000, OBCL has supportive alumni who will contribute if the need arises. OBCL will make enrollment decisions only if it has sufficient assets to teach students through their four years of law school. OBCL disagrees with the Inspection Team’s conclusion and has explained why OBCL is in compliance.

On behalf of the administration of Oak Brook College, we are grateful for the opportunity to respond to the Inspection Team’s Report and for the assistance of the CA Bar staff in the process.

Sincerely,


Douglas McElvy, Dean



Oak Brook College of Law

Pro Deo et Patria

March 20, 2020

Natalie Leonard
Principal Program Analyst, Educational Standards
Office of Admissions
State Bar of California
180 Howard Street
San Francisco, CA 94105

RE: Response to 2019 Periodic Inspection Report: Oak Brook College of Law

Dear Ms. Leonard:

We are pleased to receive the report on the periodic inspection conducted on December 5-6, 2019, that includes a recommendation that Oak Brook College continue to be registered as an unaccredited correspondence law school subject to certain recommendations.

Response to Recommended, Mandatory Actions

1. **Guidelines 4.8. and 4.9 regarding faculty evaluations:** As indicated in the report, OBCL has already changed its faculty evaluation policy and will proceed on the basis of the revised policy.
2. **Guideline 5.2(G) and 5.16 regarding final exams:** The faculty members have been made aware of the concern about the breadth and depth of examinations. A review of exams will be conducted by experienced faculty members or the Associate Dean.
3. **Guideline 9.1(D) concerning student transcripts:** The OBCL administration will review all transcripts to make sure they comply with Guideline 9.1(D).

Response to Recommended Suggestions to Enhance Compliance

1. **Pursuant to Guideline 5.2(C) regarding textbooks:** OBCL will review current textbooks for availability and current applicability.
2. **Pursuant to Guidelines 5.2(H) and 5.3(B)(2) regarding grading practices:** OBCL will review its grading practices and discuss them with the faculty.

On behalf of the administration of Oak Brook College, we thank the Consultant, Sally Perring, for the time she spent with us. We appreciate her valuable suggestions and comments as we strive to improve the quality of our educational program.

Sincerely,

A handwritten signature in dark ink, appearing to read "Douglas McElvy".

Douglas McElvy
Dean



OAK BROOK COLLEGE OF LAW

Mail: P.O. Box 26870, Fresno, California 93729

Shipping: 7650 N. Palm Ave., Suite 101B, Fresno, California 93711

559.650.7755 • Fax 559.650.7750 • www.obcl.edu

STUDENT DISCLOSURE STATEMENT

The disclosures included herein are required by Rule 4.241 of the *Unaccredited Law School Rules* and Guideline 2.3(D) of the *Guidelines for Unaccredited Law School Rules*. This Disclosure statement must be provided to each prospective student upon payment of an application fee, but before payment of a registration fee, and to each new or returning student, prior to payment for any academic term. This disclosure must be signed by the enrolling student and the student shall receive a copy of the signed statement.

1. The method of instruction at this law school for the Juris Doctor (J.D.) degree program is principally by correspondence.

Students enrolled in the J.D. degree program at this law school who successfully complete the first year of law study must pass the First-Year Law Students' Examination required by Business and Professions Code §6060(h) and Title 4, Division 1, Chapter 1 Rule 4.3(I), of the *Rules of the State Bar of California* as part of the requirements to qualify to take the California Bar Examination. A student who passes the First-Year Law Students' Examination within three (3) administrations of the examination after first becoming eligible to take it will receive credit for all legal studies completed to the time the examination is passed. A student who does not pass the examination within three (3) administrations of the examination after first becoming eligible to take it must be promptly disqualified from the law school's J.D. degree program. If the dismissed student subsequently passes the examination, the student is eligible for re-enrollment in this law school's J.D. degree program, but will receive credit for only one year of legal study.

Study at, or graduation from, this school may not qualify a student to take the bar examination or to satisfy the requirements for admission to practice in jurisdictions other than California. A student intending to seek admission to practice law in a jurisdiction other than California should contact the admitting authority in that jurisdiction for information regarding the legal education requirements in that jurisdiction for admission to the practice of law.

2. Oak Brook College of Law is not accredited by the Committee of Bar Examiners of the State Bar of California, but is registered as an unaccredited correspondence law school.
3. Oak Brook College has not applied for accreditation in the previous five years.
4. The education provided by Oak Brook College of Law may not satisfy the requirements of other jurisdictions for the practice of law. Applicants should contact the jurisdiction in which they may wish to practice for that jurisdiction's requirements to practice law.
5. Oak Brook College of Law has not been issued a Notice of Noncompliance by the Committee of Bar Examiners.
6. The ratio of faculty to students for the previous five years has been:

2023 - 2024: 15 Faculty per 18 students
2022 - 2023: 15 Faculty per 27 students
2021 - 2022: 14 Faculty per 30 students
2020 - 2021: 14 Faculty per 32 students
2019 - 2020: 14 Faculty per 27 students

7. Total number of students who did not remain enrolled in the JD program (attrition rate), on either a voluntary or involuntary basis, during the 52 weeks ending September 15 of the year indicated below (includes those who transferred to other schools):

Academic Year	First Year	Second Year	Third Year	Fourth Year
2023-2024	2	4	0	0
2022-2023	1	4	0	0
2021-2022	3	2	0	1
2020-2021	5	7	0	0
2019-2020	4	0	0	0

8. The number and passage results of Oak Brook College of Law students who have taken the First Year Law Students' Examination and General Bar Examination in the past five years is as follows:

FIRST-YEAR LAW STUDENTS' EXAMINATION PASSAGE STATISTICS

Data Source: State Bar of California

Exam Date	All Takers			First Timers			Repeaters		
	Took	Passed	% Passed	Took	Passed	% Passed	Took	Passed	% Passed
Jun-24	1	1	100%	0	0	-	1	1	100%
Oct-23	0	0	-	0	0	-	0	0	-
Jun-23	1	1	100.0%	0	0	-	1	1	100.0%
Oct-22	7	2	28.6%	5	1	20.0%	2	1	50.0%
Jun-22	3	0	-	2	0	0.0%	1	0	0.0%
Oct-21	8	4	50.0%	5	3	60.0%	3	1	33.3%
Jun-21	6	3	50.0%	1	0	0.0%	5	3	60.0%
Nov-20	14	7	50.0%	13	7	53.8%	1	0	0.0%
Oct-20	5	2	40.0%	1	1	100.0%	4	1	25.0%
Oct-19	8	3	37.5%	7	3	42.9%	1	0	0.0%
Total	53	23	43.3%	34	15	44.1%	19	8	42.1%

*The totals for All Takers and Repeaters include individuals who have sat for the FYLSX multiple times. The total number of first time takers reflects the actual number of OBCL students who have sat for the exam.

The average passage rate for OBCL first-time takers in the history of the school (June 1996 through June 2024) is 57.9%. The average passage rate for repeat takers for the same period is 34.1%. The actual numbers reveal that of the 546 students that have taken the FYLSX, 407 of them have passed (74.5%).

GENERAL BAR EXAMINATION PASSAGE STATISTICS*

Data Source: State Bar of California

Exam Date	All Takers			First Timers			Repeaters		
	Took	Passed	% Passed	Took	Passed	% Passed	Took	Passed	% Passed
Feb-24	10	3	30.0%	5	2	40.0%	7	1	14.3%
Jul-23	3	2	66.7%	1	1	100%	2	1	50%
Feb-23	3	1	33.3%	1	1	100.0%	2	0	0.0%
Jul-22	8	1	12.5%	2	1	50.0%	6	0	0.0%
Feb-22	5	2	40.0%	2	1	50.0%	3	1	33.3%
Jul-21	9	2	22.2%	2	2	100.0%	7	0	0.0%
Feb-21	6	0	0.0%	2	0	0.0%	4	0	0.0%
Oct-20	12	6	50.0%	2	2	100.0%	10	4	40.0%
Feb-20	8	1	12.5%	3	0	0.0%	5	1	20.0%
Jul-19	5	2	40.0%	0	0	#DIV/0!	5	2	40.0%
Total	69	20	29.0%	20	10	50.0%	51	10	19.6%

*The totals for All Takers and Repeaters include individuals who have sat for the Bar Exam multiple times. The total number of first time takers reflects the actual number of OBCL students who have sat for the exam.

The average passage rate for OBCL first-time takers in the history of the school (Feb. 2000 through Feb. 2024) is 52.6%. The average passage rate for repeat takers for the same period is 23.3%. The actual numbers reveal that of the 291 graduates that have taken the California Bar Exam, 222 of them have passed (76.3%).

The following is a summary of the educational background, qualifications, and experience of the Dean and each member of the faculty:

Robert J. Barth, Associate Dean, Professor: Professor Barth is a graduate of the University of Illinois (B.S. 1976), Southern Illinois University Law School (J.D. 1979), and the School of Public Policy at Regent University (M.A. 1986). He has taught at Regent University where he was also Assistant Dean for Academic and Student Affairs. Professor Barth is admitted to practice law in Virginia and Illinois.

Robert G. Caprera, Professor: Professor Caprera is a graduate of Duke University (B.A. 1976) and Nova University Law School (J.D. 1979). He is a member of the Massachusetts and Florida Bars, and is engaged in private practice.

John Eidsmoe, Professor: Professor Eidsmoe is a graduate of St. Olaf College (B.A., 1967), the University of Iowa College of Law (J.D., 1970), Lutheran Brethren Seminary (M.Div., 1980), Dallas Theological Seminary (M.A., 1980), Oral Roberts University (D.Min., 1985), and an Honorary Doctor of Laws from the Thomas Goode Jones School of Law. He is also a graduate of the Air Command & Staff College and the Air War College. He is a retired Air Force Judge Advocate and Lt. Colonel, an ordained pastor with the Association of Free Lutheran Congregations, admitted to the practice of law in Iowa, and is currently serving as Legal Counsel for the Foundation of Moral Law.

Peter L. Fear, Professor: Professor Fear is a graduate of Oak Brook College of Law (J.D. 1999). He is admitted to practice law in California, where he is currently engaged in private practice.

Sean J. Gallagher, Professor: Professor Gallagher is a graduate of University of Maryland (B.S. 1983) and Oak Brook College of Law (J.D. 1999). He is admitted to practice law in California.

Larry Higgins, Professor: Professor Higgins is a graduate of the University of Notre Dame (B.A. 1975) and Hamline University College of Law (J.D. 1980). He is admitted to practice law in Minnesota, where he currently engaged in private practice.

Jonathan P. Huber, Professor: Professor Huber is a graduate of Oak Brook College of Law (J.D. 2002). He is admitted to practice law in California, where he is currently engaged in private practice.

William Humble III, Professor: Professor Humble is a graduate of Oak Brook College of Law (J.D. 2001). He is admitted to practice law in California.

Michael A. Kern, Professor: Professor Kern is a graduate of is a graduate of Oak Brook College of Law (J.D. 2011). He is admitted to practice law in California and has worked as a Deputy District Attorney in Southern California since 2012. He received a Master's Degree in Leadership and Administration.

Douglas McElvy, Dean and Professor: Professor McElvy is a graduate of the University of Alabama where he earned a Bachelor of Science in Commerce and Business Administration with a major in Accounting in 1967. He received his Juris Doctor in 1971 from the University of Alabama. He is admitted to practice law in Alabama, U.S. Federal Courts, and the U.S. Supreme Court.

Thomas H. Moller, Professor: Professor Moller is a graduate of University of California, San Diego (B.S. 1999) and Oak Brook College of Law (J.D. 2018). He is admitted to practice law in California, where he is currently engaged in private practice.

Peter A. Sauer, Professor: Professor Sauer is a graduate of Oak Brook College of Law (J.D. 2007). He is admitted to practice law in California, where he is currently engaged in private practice.

David J. Siegrist, Professor: Professor Siegrist is a graduate of the University of Illinois (B.S. 1978) and Drake University (J.D. 1981). He is admitted to practice law in Iowa, where he is currently engaged in private practice.

Nekishia L. Spinner, Professor: Professor Spinner is a graduate of the University of Miami (B.S. 2000) and University of Miami School of Law (2003). She is admitted to practice law in Florida.

Robert Whalen, Professor: Robert Whalen, Professor: Professor Whalen is a graduate of California State University, Fresno (B.S. 1987) and Regent University (J.D., 1997). He is judge of the Superior Court of Fresno County in California. Professor Whalen is admitted to practice law in California.

I ACKNOWLEDGE RECEIPT OF A COPY OF THIS DISCLOSURE STATEMENT ON THE DATE LISTED BELOW, WHICH CONSISTS OF 3 PAGES, INCLUDING THIS SIGNATURE PAGE.

Print Name of Student

Signature of Student

Date: _____

**January 2025 Annual Disclosure by California Unaccredited Law Schools Under
California Business & Professions Code Section 6061.7(a)**

Name of Law School:

Oak Brook College of Law and Government Policy

Primary Address:

7650 N. Palm Ave, Suite 101B, Fresno, CA 93711

Approved Branch Campus(es):

Law schools that are registered or accredited in the State of California but are not approved by the American Bar Association must file this disclosure at the start of each calendar year pursuant to California Business & Professions Code section 6061.7(a). Data in this report covers the 52 weeks ending September 15, 2024 unless noted. The State Bar of California's website includes a [list](#) of all law schools that are registered as unaccredited or accredited in California.

1. Admissions Data:

a) Total number of first year applications received: 5

b) Total number of first year applications admitted: 0

c) Total number of first year applications enrolled: 0

d) Undergraduate Grade Point Average (GPA) for all first-year students enrolled:

75th percentile: 50th percentile: 25th percentile:

e) Law School Admissions Test (LSAT) numerical score for all first-year students enrolled who provided an LSAT score (if LSAT is required or accepted for admission):

75th percentile: 50th percentile: 25th percentile:

2. Time and Charges to earn a JD degree as of September 15, 2024

- | | |
|---|-----------|
| a) Total number of units required to earn a JD degree: | 87 |
| b) Estimated total tuition charged to complete a JD degree: | \$ 40,000 |
| c) Estimated total fees charged to complete a JD degree: | \$ 1,200 |

3. Financial Aid Available to First-Year Students (if qualified):

<input type="checkbox"/> Federal Guaranteed Loans	<input type="checkbox"/> Unrestricted Scholarships/Grants/Discounts:
<input type="checkbox"/> Private Student Loans	Total number awarded: Total dollar amount awarded: \$
<input type="checkbox"/> Veteran Educations Benefits	<input type="checkbox"/> Conditional Scholarships/Grants:
<input type="checkbox"/> California Department of Rehabilitation	Total number awarded: Total dollar amount awarded: \$

Description of all conditions (e.g., cumulative GPA) required to maintain such scholarship

N/A

4. Enrollment Data

- a. Total number of students enrolled per class in the law school's JD degree program during the 52 weeks ending September 15 of the year indicated below:

	2021	2022	2023	2024
1st Year	9	0	10	8
2nd Year	8	6	1	0
3rd Year	4	8	5	2
4th Year	3	4	7	6
Total JD enrollment	24	18	23	16

- b. Total number of students who transferred to or from the JD program during the 52 weeks ending September 15 of the year indicated below:

	2021	2022	2023	2024
Transfers (to)	0	0	0	0
Transfers (from)	0	0	0	0

- c. Total number of students who did not remain enrolled in the JD program, on either a voluntary or involuntary basis, during the 52 weeks ending September 15 of the year indicated below (includes those who transferred to other schools):

	2021	2022	2023	2024
Total Attrition (#)	12	6	5	6

5. Law School administrators, Faculty, and Librarians as of September 15, 2024:

- a) Number of full time-faculty: 0
b) Number of part-time faculty: 15
e) Number of trained and degreed librarians (full- or part-time): 0
c) Number of full-time administrators: 0
d) Number of part-time administrators: 2

6. Required Courses and Clinical Courses as of September 15, 2024:

- a) Number of required courses for JD degree: 22
b) Average class size for required courses: 4
c) Number of school-sponsored clinical programs offered for credit: 0

7. Employment Outcomes:

The percentage of students graduating in **2021** who were employed in 2022, 2023, or 2024 in: a) Jobs that require a JD degree; or b) jobs in which holding a JD degree is an advantage:

- Total number of 2021 JD graduates: 3
Total number of 2021 JD graduates surveyed: 2
Total number of surveys returned: 2
Survey response rate: %

Employment Status of 2021 Grads in:	2022	2023	2024
JD degree required job	0 %	0 %	33 %
JD degree advantage job per job description	66 %	66 %	33 %

Survey conducted between 11/13/24 and 11/13/24

8. California Bar Examination Cumulative Passage Data Calculated using the formula set forth in Accredited Rule 4.160(D) Minimum, Cumulative Five-Year Bar Passage Rate (MPR) Reporting Period: August 1, 2018 - July 31, 2023

Cumulative percentage of students who graduated during the Reporting Period and passed any California Bar Examination during the Reporting Period or the February 2024 bar exam, if they graduated within 10 administrations of that bar exam; adjusted to exclude those pursuing licensure under CRC 9.49.1 and include those who have licensed through this option. While accredited law schools must maintain a 40% MPR or higher, there is no minimum pass rate for unaccredited schools. 77.77 %